

## Complaint Description

Peter Starzynski (Mon, 18 Feb 2019 at 3:34 PM)

Peter Lavelle  
Executive Director  
Washington State Public Disclosure Commission  
PO Box 40908  
Olympia, WA 98504-0908

Re: Complaint Against We the Governed

Dear Mr. Lavelle:

It has come to my attention that We the Governed PAC and its sole officer, Glen Morgan, are out of compliance with the Fair Campaign Practices Act, failing to file *any* reports with the PDC, despite registering as a political committee in 2016 and making expenditures since then in support of, and in opposition to, candidates and ballot propositions.

### **1. We the Governed Has Failed to File Numerous Reports.**

We the Governed has failed to file any reports since registering as a political committee, including numerous C-3 and C-4 reports. We the Governed has nonetheless engaged in many activities that should have been reported, resulting in those activities being concealed from public view for the past several years.

We the Governed maintains a fundraising website through which supporters can make financial contributions. See <https://www.wethegoverned.com/support/>. Not only does We the Governed solicit contributions generally, it offers supporters the option to make ongoing monthly contributions of \$10-\$200/month. Yet the PAC has never once filed a C-3 report disclosing the source of support that allows it to continue operating.

We the Governed has also failed to report any ongoing expenditures in C-4 reports, despite somehow managing to operate for over two years and incurring expenses such as, at the very least, the fees necessary to keep the wethegoverned.com running as a website. We the Governed has never reported the costs associated with creating or buying the rights to use the pictures and graphics scattered throughout the website, and has never reported the cost of producing videos despite maintaining a YouTube presence. To the extent the blog has not paid cash for any services it has received, then it has failed to report the value of in-kind contributions it has received.

If We the Governed has made any contributions to candidates or initiatives, that also has been concealed from public view due to the failure to file any C-4 reports. Many of We the

Governed’s blog posts and videos also constitute independent expenditures, with a value equal to the staff time and other resources expended in producing and distributing same, that should have been reported on C-6 reports.

The failure to file any C-3, C-4, C-6, or other reports with the PDC constitutes a serious violation of the Fair Campaign Practices Act (“FCPA”).

**2. We the Governed Has Failed to Comply with Laws Governing Political Advertising**

WetheGoverned.com contains political advertising endorsing candidates and ballot measures at every level of state government. We the Governed has issued countless blog posts with the purpose of appealing to voters within the meaning of RCW 42.17A.005(40). Yet, the website fails to identify the address of the sponsor, the required information about the PAC’s top five contributors, or the statement that “no candidate authorized the ad” as required by RCW 42.17A.320.

**3. Morgan Has Acted Willfully and Maliciously.**

The willful nature of Mr. Morgan’s violations is irrefutable given that there can be no doubt that Mr. Morgan is well familiar with the FCPA’s requirements. As someone who has filed literally hundreds of citizen complaints, Mr. Morgan cannot claim ignorance of the law.

It is also worth noting that this is not Mr. Morgan’s first violation of the FCPA. PDC staff initiated a complaint against Mr. Morgan in 2014, a case that remains open as half of the penalty imposed on Morgan was suspended and remains pending. See PDC enforcement case number 14-072.

We urge the PDC to conduct an immediate review into these allegations. The serious nature of these actions warrants referral to the Attorney General, pursuant to RCW 42.17A.755(4). The severity of the FCPA violations committed by Morgan and We the Governed warrant penalties greater than the maximum the PDC is authorized to impose.

Sincerely,

Peter Starzynski  
Executive Director, Northwest Accountability Project

PO Box 42561  
Portland, OR 97242  
[peter@nwaccountabilityproject.com](mailto:peter@nwaccountabilityproject.com)  
509-309-8071

**What impact does the alleged violation(s) have on the public?**

**List of attached evidence or contact information where evidence may be found.**

**List of potential witnesses with contact information to reach them.**

**Complaint Certification:**

I certify (or declare) under penalty of perjury under the laws of the State of Washington that information provided with this complaint is true and correct to the best of my knowledge and belief.

Committee Name (Include sponsor in committee name. See next page for definition of "sponsor." Show entire official name. Do not use abbreviations or acronyms in this box.)  
**We the Governed**

Acronym:  
 Telephone: **(360) 791-6556**

Mailing Address  
**1001 Cooper Pt. Rd SW #140-222**

Fax: ( )

City **Olympia** County **Thurston** Zip + 4 **98502**

E-mail: **glenmorgan89@gmail.com**

NEW OR AMENDED REGISTRATION?  
 NEW. Complete entire form.  
 AMENDS previous report. Complete entire form.

COMMITTEE STATUS  
 Continuing (On-going; not established in anticipation of any particular campaign election.)  
 \_\_\_\_\_ election year only. Date of general or special election: \_\_\_\_\_ (Year)

1. What is the purpose or description of the committee?  
 **Bona Fide Political Party Committee** - official state or county central committee or legislative district committee. If you are not supporting the entire party ticket, attach a list of the names of the candidates you support.

**Ballot Committee** - Initiative, Bond, Levy, Recall, etc. Name or description of ballot measure: \_\_\_\_\_

Ballot Number FOR AGAINST

**Other Political Committee** - PAC, caucus committee, political club, etc. If committee is related or affiliated with a business, association, union or similar entity, specify name: \_\_\_\_\_

**For single election-year only committees (not continuing committees):** Is the committee supporting or opposing  
 (a) one or more candidates?  Yes  No If yes, attach a list of each candidate's name, office sought and political party affiliation.  
 (b) the entire ticket of a political party?  Yes  No If yes, identify the party:

2. Related or affiliated committees. List name, address and relationship.  Continued on attached sheet.

3. How much do you plan to spend during this entire election campaign, including the primary and general elections? Based on that estimate, choose one of the reporting options below. (If your committee status is continuing, estimate spending on a calendar year basis.)  
 If no box is checked you are obligated to use Full Reporting. See instruction manuals for information about reports required and changing reporting options.

**MINI REPORTING**  
 Mini Reporting is selected. No more than \$5,000 will be raised or spent and no more than \$500 in the aggregate will be accepted from any one contributor.

**FULL REPORTING**  
 Full Reporting is selected. The frequent, detailed campaign reports mandated by law will be filed as required.

4. Campaign Manager's or Media Contact's Name and Address  
**Glen Morgan 1001 Cooper Pt. Rd. SW #140-222**  
**Olympia WA 98502**

Telephone Number:  
**(360) 791-6556**

5. Treasurer's Name and Address. Does treasurer perform only ministerial functions? Yes  No  See WAC 390-05-243 and next page for details. List deputy treasurers on attached sheet.  Continued on attached sheet.

**ORIN R. WELLS 3611 E ST. NE #197 Auburn, WA 98002**

Daytime Telephone Number:  
**(253) 630-5296**

6. Persons who perform only ministerial functions on behalf of this committee and on behalf of candidates or other political committees. List name, title, and address of these persons. See WAC 390-05-243 and next page for details.  Continued on attached sheet.

7. Committee Officers and other persons who authorize expenditures or make decisions for committee. List name, title, and address. See next page for definition of "officer."  Continued on attached sheet.

**Glen Morgan - Manager**  
**1001 Cooper Pt. Rd, SW #140-222**  
**Olympia, WA 98502**

8. Campaign Bank or Depository  
**Washington State Employees Credit Union** Branch **Tumwater** City **Tumwater**

9. Campaign books must be open to the public by appointment between 8 a.m. and 8 p.m. during the eight days before the election, except Saturdays, Sundays, and legal holidays. In the space below, provide contact information for scheduling an appointment and the address where the inspection will take place. It is not acceptable to provide a post office box or an out-of-area address.  
 Street Address, Room Number, City where campaign books will be available for inspection  
**101 Auburn Way S, Auburn, WA 98002**  
 In order to make an appointment, contact the campaign at (telephone, fax, e-mail): **(253) 630-5296**

10. Eligibility to Give to Political Committees and State Office Candidates: A committee must receive \$10 or more each from ten Washington State registered voters before contributing to a Washington State political committee. Additionally, during the six months prior to making a contribution to a state office candidate your committee must have received contributions of \$10 or more each from at least ten Washington State registered voters.

A check here indicates your awareness of and pledge to comply with these provisions. Absence of a check mark means your committee does not qualify to give to Washington State political committees and/or state office candidates.

11. Signature and Certification. I certify that this statement is true, complete and correct to the best of my knowledge.

Committee Treasurer's Signature **Orin R. Wells** Date **8/31/2016**